May 26, 2021

## By ECF

Honorable Paul A. Engelmayer, Thurgood Marshall United States Courthouse, 40 Foley Square New York, New York 10007-1312.

Re: *In re JPMorgan Treasury Futures Spoofing Litigation*, No. 1:20-cv-03515-PAE (S.D.N.Y.)

Dear Judge Engelmayer:

On behalf of the parties to the above-captioned action, we write to (i) update the Court on the status of settlement efforts, and (ii) request the suspension of case deadlines pending the filing of a motion for preliminary approval of a class settlement.

Since the Court's last order extending case deadlines on March 18, 2021 (ECF No. 56), the parties continued their mediation efforts and are pleased to inform the Court that they this week entered into a binding, confidential term sheet that contains an agreement in principle to resolve this action. The confidential term sheet, executed May 25, includes an agreement to negotiate, finalize, and file formal settlement documents within 90 days. If approved by the Court, the settlement will resolve this action in its entirety.

As a result, the Parties respectfully request that the Court suspend existing case deadlines to enable the Parties to finalize and file a motion for preliminary approval of the settlement on or before August 23, 2021.<sup>1</sup> There have been four previous requests for extensions of time in this matter (ECF Nos. 41, 51, 53, 55), and Your Honor granted those requests with modifications (ECF Nos. 43, 52, 54, 56).

We are available at the Court's convenience to discuss these matters.

<sup>&</sup>lt;sup>1</sup> The current deadlines in this case require (i) JPMorgan to answer, move to dismiss, or otherwise respond to the Consolidated Complaint by May 28, 2021, (ii) Plaintiffs to file their opposition to JPMorgan's motion to dismiss by July 27, 2021, and (iii) JPMorgan to file its reply in support of its motion to dismiss by August 26, 2021. (ECF No. 56.)

Hon. Paul A. Engelmayer

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Respectfully submitted,

/s/ *Amanda F. Davidoff* 

Amanda F. Davidoff Counsel for Defendants

/s/ Raymond P. Girnys

Raymond P. Girnys Co-Lead Counsel for Plaintiffs

/s/ Karen M. Lerner

Karen M. Lerner

Co-Lead Counsel for Plaintiffs

All counsel of record (via ECF) cc:

Granted. All deadlines in the case are stayed until August 23, 2021. On or before that date, the parties will submit a motion for preliminary approval of the settlement.

SO ORDERED.

United States District Judge

May 28, 2021